

ADDENDUM I

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)
HAZARDOUS WASTE MANAGEMENT FACILITY - PART A APPLICATION
REVISION

This serves as a justification for the revision of the Pratt & Whitney Aircraft Group, Part A, Resource Conservation and Recovery Act (RCRA), Hazardous Waste Management Facility (HWMF) application for the East Hartford Main Plant. This justification is required by Title 40 of the Code of Federal Regulations Part 122.23 c(2). The facility modification that necessitates the revision is reflected on Line 7 of Page 1 of RCRA Form 3. The additional incineration capacity of 0.30 tons per hour (600 pounds per hour) will result from the installation of a rotary kiln incinerator used to incinerate solid and semi-solid industrial wastes. Only a small portion (a maximum of 15%) of the waste to be incinerated is now considered to be a RCRA hazardous waste.

Because of the uncertain ability to continually dispose of its hazardous waste in an approved manner, and of the liability associated with hazardous waste mismanagement, the Pratt & Whitney Aircraft Group, Manufacturing Division has made it a policy to treat and dispose of its industrial waste in-house according to RCRA regulations. Originally the existing industrial waste incinerator, which was under construction on November 19, 1980, was to incinerate solid as well as liquid wastes. Upon further study it has been

determined that only liquid wastes will be incinerated in the existing incinerator. Therefore, an Industronics, Inc. HV-30 incinerator or equivalent with waste heat boiler and scrubber is proposed for the incineration of the solid and semi-solid wastes.

The appropriation for this incinerator system is \$250,000 and the total replacement cost of the East Hartford HWMF is estimated to be \$1.4 million.